

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

In re:
VICTOR MICHAEL MATICHKO, JR. and)
MARYSSA ANNE MATICHKO,) No. 18-24578-JAD
Debtors,)
) Chapter 13
)
) Doc. No.
)
VICTOR MICHAEL MATICHKO, JR. and) Related to Doc. No.
MARYSSA ANNE MATICHKO,)
Movants,)
)
-vs-)
FLAGSTAR BANK, FSB, and)
RONDA J. WINNECOUR, TRUSTEE,)
Respondents.)

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE
FILED JANUARY 31, 2020

AND NOW, come Debtors, Victor Michael Matichko, Jr., and Maryssa Anne Matichko, by and through counsel, Matthew R. Schimizzi, Esquire and Schimizzi Law, LLC, and files the following Declaration regarding the Notice of Mortgage Payment Change filed by Flagstar Bank, FSB, on January 31, 2020:

1. Respondent, Flagstar Bank, FSB, filed a Notice of Mortgage Payment Change on January 31, 2020, pursuant to which Debtors' monthly mortgage payment will increase from \$993.97 to \$1,000.90, effective March 1, 2020.
2. Being filed contemporaneously with this Declaration is a motion to increase the current wage attachment order so that an additional \$7.00 will be withheld by Debtor's employer and remitted to the Trustee to accommodate the mortgage payment change.
3. As a result of the proposed increase in Debtor's wage attachment, Debtors' monthly Plan payment will be sufficient to fully fund their Plan.

Respectfully submitted:

Dated: February 5, 2020

/s/ Matthew R. Schimizzi
Matthew R. Schimizzi, Esquire
Counsel for Debtors
PA I.D. 307432
35 W. Pittsburgh St.
Greensburg, PA 15601
Phone: (724) 838-9722
Fax: (724) 837-7868
Email: mrs@schimizzilaw.com